

March 22, 2019

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## **VIA ECFS**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Room TWA325 Washington, DC 20554

Re: Notice of *Ex Parte* Presentation ET Docket No. 18-39

Dear Ms. Dortch:

Sensible Medical Innovations Ltd. ("Sensible"), through its counsel, submits this letter to respond to comments by the GPS Innovation Alliance ("GPSIA"), which involves Sensible's request for a limited waiver of the FCC's Part 15 rules governing ultra-wideband medical imaging devices. Sensible seeks these waivers to market a medical device that uses dielectric sensing to provide non-invasive measurement of lung fluid (the "ReDS System").<sup>1</sup>

Following the comments from GPSIA, and in order to mitigate concerns of interference, Sensible proposes to modify the third frequency in its frequency table from 1164.0625 to 1163.0625 MHz,<sup>2</sup> avoiding the frequency range to which Section 15.513(e) applies.<sup>3</sup>

Nadav Mizrahi SENSIBLE MEDICAL INNOVATIONS LTD. 6 Meir Ariel Street Netanya 4059300 Israel POB 8702 Respectfully submitted,

/s/ Michele C. Farguhar

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Counsel to Sensible Medical Innovations Ltd.

cc: Hugh Van Tuyl Jamison Prime

Sensible, Request for Waiver, ET Docket No. 18-39 (filed Jan. 16, 2018); Office of Engineering and Technology Seeks Comment on Sensible Medical Innovations Ltd's Request for Waiver of Part 15 Ultra-Wideband Rules for Medical Imaging System, Public Notice, 33 FCC Rcd 1307 (OET 2018).

47 C.F.n. § 13.313(e).

<sup>&</sup>lt;sup>2</sup> See Letter from Michele C. Farquhar, Counsel, Sensible, to Marlene H. Dortch, Secretary, FCC, ET Docket No. 18-39, at 2 (filed Sept. 5, 2018) (providing the full 16 frequency table).

<sup>&</sup>lt;sup>3</sup> 47 C.F.R. § 15.513(e).